

EXHIBIT H

Raymond Gough

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to: <i>Johnson, et al. v. The Islamic Republic of Iran</i>	18-cv-12344 (GBD)(SN) ECF Case

DECLARATION OF RAYMOND GOUGH

I, Raymond Gough, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than eighteen (18) years of age and I have personal knowledge of and am competent to testify to the matters stated in this declaration.
2. I am a citizen of the United States. I was a citizen of the United States on September 11, 2001.
3. On September 11, 2001, I was employed by the Monmouth Ocean Hospital Service Corporation as a paramedic/manager. I was attending an association meeting at a hotel in Monmouth County when I heard reports of a plane hitting the World Trade Center. I was watching the television coverage along with others at the meeting when it was reported the second tower had been hit. At that point it was clear that this was not accidental. The president of the association instructed us all to go to our operation bases and prepare for emergency deployment.
4. I was responsible for the logistics of getting the ambulances and trucks to where patients were expected to be brought from the WTC. Some of these areas included the local airport and the Atlantic Highlands ferry terminal, among others. I was also securing spare ambulances and supplies and coordinating their distribution through the communications center. We also

volunteered to send units in the days following the attacks. We were subsequently contacted by the command center at the Jacob Javits Convention Center and asked to assist. On September 14th, two trucks carrying West Jersey Search and Rescue personnel responded. My wife and I were among those who responded. Shortly after arriving at the Javits Center, we were sent to Ground Zero where we signed in at the staging area operated by the New York City Fire Department (FDNY). While waiting to go to the pit, we were sent upstairs to the second floor of a building that had been blown out by the attacks. It was covered in dust, glass, rock, and debris and we had to make way for six firefighters with body bags carrying the remains of the deceased. The body bags were taken to were refrigerated trailers being used as a temporary morgue at the site.

5. We were deployed to the pit to help remove debris to make a path for the bucket brigade that was sifting through the rubble and passing anything they found down the line. While we were working on the pit, we wore respirators we had brought with us approximately ten percent of the time. Unfortunately, the respirators were very difficult to work in. They were extremely hot and it was impossible to communicate while wearing them. Despite the way the site and the air around it appeared, the Environmental Protection Agency told us that the air quality was good so we were not as concerned as we would have been otherwise.

6. We worked at the Pit for sixteen hours on September 14. On the September 16, we were assigned to the landfill at Fresh Kills where we worked with a canine unit searching for human remains, as well as evidence and personal items. During the time I was at the landfill, I recovered human remains including soft tissue, bone and on one occasion a left arm, shoulder to fingertips. We worked at the landfill until October 24, 2001.

7. The first day I worked at Ground Zero I developed a cough. It was immediate and it stayed for a long time after I had left both Ground Zero and the landfill. The air at both sites adversely affected my sinuses, causing irritation and congestion. At the end of a shift at either place, my cough and clearing my nose produced a gray discharge. Although I experienced these problems while at the sites and even for a long time after I left, I had no inkling that I had permanent damage to my health from my time there. I continued to see my private physician to treat these conditions for several years after the attacks.

8. The issue I was dealing with that I knew was related to my time working at Ground Zero and the landfill was post-traumatic stress disorder (PTSD). I have experienced flashbacks through all my senses, visual, auditory, olfactory, and tactile. I have also experienced nightmares and night terrors. In 2003, I was diagnosed with PTSD and began seven years of therapy and medication. It was so severe that I attempted suicide prior to my treatment. I continue to struggle with PTSD to this day.

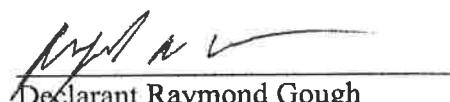
9. In 2004 or 2005 one of the search and rescue team members that had been with us at Ground Zero and Fresh Kills Landfill told my wife and me about the World Trade Center Health Program. We learned it was a monitoring program for those who had responded after the attacks that might be suffering ill effects from the exposure to environmental toxins that had been in the air at the 9/11 sites. I signed up for the program and was examined at Rutgers Clinical Center of Excellence. I was found to have conditions linked to my exposure from work after 9/11 in New York.

10. After having my conditions diagnosed by the WTCHP and linked to 9/11, I decided to apply to the Victim Compensation Fund (VCF). The VCF found that, based on information I provided to them and the information it received from the WTCHP, I was eligible for compensation

for injuries including chronic airway obstruction, chronic laryngitis, chronic nasopharyngitis, chronic rhinitis, esophageal reflux, chronic bronchitis, chronic sinusitis, and obstructive sleep apnea. I have also been diagnosed with reactive airways dysfunction syndrome (RADS) and PTSD. I have attached a true and correct copy the VCF eligibility determination letter documenting the physical injuries I suffered as a result of the attacks on 9/11 and it is submitted with this declaration as part of this exhibit.

I DECLARE UNDER PENALTY OF PERJURY that the foregoing is true and correct.

DATED this 3rd day of June, 2025.



Declarant Raymond Gough

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September 11th
Victim Compensation Fund

October 22, 2014

RAYMOND GOUGH



Dear Raymond Gough:

Your Eligibility Form for the September 11th Victim Compensation Fund (VCF) has been reviewed. You submitted an Eligibility Form for Personal Injury Claimants. Your claim number is VCF0023462. The Claims Evaluator determined that your Eligibility Form was substantially complete on October 22, 2014. As stated in the Regulations and on the Eligibility Form, by filing a substantially complete Eligibility Form, you have waived your right to file or be a party to a September 11th-related lawsuit.¹ For more information about this topic, please review Frequently Asked Questions (FAQ) 7.1-7.4 on <http://www.vcf.gov/faq.html>.

The Decision on your Claim

The VCF has determined that you meet the eligibility criteria established in the statute (the Zadroga Act and the original statute) and regulations and therefore the VCF will review your Compensation Form and supporting materials to determine the amount of any award. Based on the information you submitted and information the VCF has received from the World Trade Center Health Program (WTCHP), you have been found eligible for the following injuries:

- CHRONIC AIRWAY OBSTRUCTION NEC
- CHRONIC LARYNGITIS AND RELATED PHYSICAL CONDITIONS CERTIFIED BY THE WTCHP: OBSTRUCTIVE SLEEP APNEA
- CHRONIC NASOPHARYNGITIS AND RELATED PHYSICAL CONDITIONS CERTIFIED BY THE WTCHP: OBSTRUCTIVE SLEEP APNEA
- CHRONIC RHINITIS AND RELATED PHYSICAL CONDITIONS CERTIFIED BY THE WTCHP: OBSTRUCTIVE SLEEP APNEA
- ESOPHAGEAL REFLUX AND RELATED PHYSICAL CONDITIONS CERTIFIED BY THE WTCHP: OBSTRUCTIVE SLEEP APNEA
- SIMPLE CHRONIC BRONCHITIS
- UNSPECIFIED SINUSITIS AND RELATED PHYSICAL CONDITIONS CERTIFIED BY THE WTCHP: OBSTRUCTIVE SLEEP APNEA

Please note that there are several reasons why an injury that you think should be eligible is not listed above. First, for non-traumatic injuries, the description of the injury is based on the

¹ The Statute (the Air Transportation Safety and System Stabilization Act as amended by the Zadroga Act) and the Regulations are located at <http://www.vcf.gov/lawRulesOtherDocs.html>.

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September 11th
Victim Compensation Fund

Information provided by the WTCHP and there can be several alternative descriptions for the same injury. Additionally, a WTCHP physician may have provided testing or treatment for an injury even if the WTCHP has not certified that injury for treatment. Finally, your injury may not be listed if it was only recently certified for treatment by the WTCHP. The VCF regularly receives updated information from the WTCHP and will notify you if additional injuries have become eligible.

What Happens Next

The VCF will determine your compensation award based solely on the eligible injuries listed above. In order for the VCF to do so, you must submit the Compensation Form for Personal Injury Claimants and the required supporting documents. If you have not already done so, please submit the Compensation Form and the required supporting documents as soon as possible. You are encouraged to submit the Compensation Form through the VCF's web-based claim system at www.vcf.gov. If you wish to complete the Compensation Form in hardcopy, you may request the form by contacting the toll-free Helpline at 1-866-885-1556. For the hearing impaired, please call 1-866-885-1558 (TDD). If you are calling from outside the United States, please call 1-202-353-0356.

In addition to the Compensation Form, please also complete and submit the VCF ACH Payment Information Form. This form can be found on our website in Section 8 of the Frequently Asked Questions (FAQs). The completed form must be submitted before the VCF can arrange for any payment.

The VCF will be able to determine your compensation award based on the eligible conditions after all compensation related documents are submitted. When you receive an award letter, you will have the right to appeal. In that appeal, you have the right to assert additional injuries that you believe are eligible and for which you believe you should be compensated. For purposes of the statutory deadlines, the injuries listed in your claim form and the injuries certified as eligible will be deemed "listed". You will receive instructions on the appeal process when you receive the letter with details of your compensation award.

If you have questions about the information in this letter or the claims process in general, please contact our toll-free Helpline at the number noted above. Every effort will be made to respond to your inquiries as soon as possible.

Sincerely,

September 11th Victim Compensation Fund

cc: RAYMOND GOUGH